

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

Erin Wilson, <i>individually and on behalf</i>)	Civil Action No.: 25-cv-00201
<i>of others similarly situated,</i>)	
)	Class Action Complaint
Plaintiff,)	
)	Jury Trial Demanded
v.)	
)	
McNamara Chiropractic LLC)	
)	
Defendant.)	
)	

**PLAINTIFF’S MOTION TO EXTEND THE TIME FOR
THE PLAINTIFF TO FILE A MOTION FOR CLASS CERTIFICATION**

COME NOW, Plaintiff Erin Wilson (“Wilson” or “Plaintiff”) and respectfully requests that that the Plaintiff be able to file a motion for class certification at a time that is Ordered by the Court when a joint proposed Scheduling Order is issued.

In support of this Motion, the Parties show the Court as follows:

1. The Plaintiff filed this Class Action Complaint, alleging violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227 on behalf of a national class. Pursuant to Local Rule 23.1(B), Plaintiff’s Motion for Class Certification is currently due within 90 days from the filing of the lawsuit.

2. The Defendant has not yet responded to the complaint and the Plaintiff will need to conduct discovery and secure expert testimony before a motion for class certification can be filed. As such, the Plaintiff requests that the motion for class

certification be filed at a time that is Ordered by the Court when a joint proposed Scheduling Order is issued. This Court has “broad discretion over the management of pre-trial activities, including discovery and scheduling.” *Johnson v. Bd. of Regents of Univ. of Ga.*, 263 F.3d 1234, 1269 (11th Cir. 2001); *see also*, *Chudasama v. Mazda Motor Corp.*, 123 F.3d 1353, 1366 (11th Cir. 1997) (“[D]istrict courts enjoy broad discretion in deciding how best to manage the cases before them.”).

WHEREFORE, the Plaintiff respectfully requests that this Motion be granted.

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